

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA)
)
)
) Case No. 21-265 (PKC)
v.)
)
) HON. PAMELA K. CHEN
CONGYING ZHENG,)
)
) MOTION FOR MODIFICATION OF
)
) BOND AND CONDITIONS OF
Defendant.) RELEASE
)

The undersigned PAUL A. GOLDBERGER, ESQ., affirms under penalty of perjury, that:

1. I represent defendant Congying Zheng in the above-captioned case.
2. At present, Mr. Zheng is subject to home confinement from Pre-trial Services.
3. Mr. Zheng has an employment offer as a component installer at Valor International located at 140 58th Street, 3D, Brooklyn, New York, NY. His working schedule will be from Monday to Friday, 9am to 5:30pm. Upon Court approval, Mr. Zheng can start his work on October 25, 2021.
4. I have conferred regarding this request with AUSA Matthew Haggans and Pre-trial Services (EMUnit), who indicate that they have no objection to modifying his conditions solely for work purposes.

WHEREFORE, the Defendant respectfully moves this Court for an Order modifying the conditions of Mr. Zheng's pre-trial release so that he is able to work and contribute to his household expenses. Furthermore, Mr. Zheng is subject to supervision as directed.

Respectfully submitted,

Dated: New York, New York
 October 19, 2021

BY: /s/
 PAUL A. GOLDBERGER